

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE
EMPRESA LOCAL GLOBAL INC
Debtor

CASE #14-06675 BKT
CHAPTER 11

PRIOR COUNSEL'S REQUEST FOR EXTENSION OF TIME TO STATE POSITION ON
REPORT FILED BY DEBTOR at doc #678

TO THE HONORABLE COURT:

COMES NOW prior counsel for D.I.P. on her own behalf and respectfully prays for relief as follows:

1. Debtor filed for bankruptcy back in **August 14, 2014** with prior counsel, who was first of three to four different counsels for debtor and whose representation was terminated within 2 months of filing for health issues.
2. Appearing counsel substituted debtor's first counsel on **October 16, 2014** at doc #64 approved on October 28, 2014 at doc #80 and our services were terminated on **March 2, 2016** on our motion to withdraw our representation of this debtor.
3. While appearing as counsel on behalf of D.I.P., appearing counsel sought approval and payment of **\$47,074** in attorney fees and **\$164.70** in expenses with the filing of Application for Compensation at doc #154. The fees were approved at doc #186, "subject to filing and approval of court prior to confirmation of an agreement by debtor's president and attorney for debtor providing for payment of outstanding attorney fees."
4. After the undersigned's Application for Compensation on **January 23, 2015** until our services were terminated on **March 2, 2016**, we did not bill the Estate for the work performed during an entire year after our Application and before termination of our services to this Estate.
5. On November 13, 2018 we filed *Prior Counsel to Debtor in Possession for Order for Payment of Outstanding Attorney Fees re doc #186* at doc #634 wherein this Court granted the same at doc #640.
6. To date this attorney's fees have not been paid, in part nor in whole.

7. On **May 24, 2019** Counsel for debtor filed doc #578 titled “Report” suggesting a payout under the Plan from what appears to be exclusively from the sale of part of the estate property to Furiel for \$165,000 and a proposed payout to both Mr. Charles Cuprill and the undersigned of \$15,000 each, as administrative expenses.
8. Administrative creditor herein, prior counsel to debtor, requires an extension of time to make known her position within at least 21 days in hopes that further discussion with debtor’s counsel will resolve our doubts and inquiries in regard to the reduction of more than one half of our approved attorney fees of almost 3 years and despite the Order granting our entire fees at doc #186 and more recently at doc #640, ordering payment of this attorney’s outstanding fees.

WHEREFORE, the undersigned past counsel for debtor, respectfully prays as follows:

- a) That extension be granted for the undersigned party to state her position at to ‘Report’ filed at doc #678 until at least **June 30, 2019**;
- b) Any remedy that this Honorable Court deem just and proper.

NOTICE

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk’s office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I HEREBY CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF Filing System which will send a notification, upon information and belief, of such filing to the U.S. Trustee and to all subscribed users, especially to counsel for debtor, Mr. Charles Cuprill, Esq. and others as follows:

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Ismael Matos Arbelo, Janet Medina Cruz, Jesus Rodriguez Marin, Jesus E Rodriguez Rivera, John & Graciela Candelaria, Jose Vazquez Medina, Jose A Sanchez Rodriguez, Jose E Molina Molina, Jose J Caraballo Lopez, Jose Luis Fernandini Torres, Juan A Rivera Rivera, Juan C Aviles Vazquez, Julia Romero Tapia, Juliana M Gonzalez Lopez, et al
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In Caguas, Puerto Rico, this June 9, 2019.

RESPECTFULLY SUBMITTED,

s/LA Morales

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